

ORIGINALUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK----- x
THE MANAGEMENT GROUP, LLC, ANDREW :
FOX, and LEE HEIMAN,

Plaintiffs,

08-02172(PKC)

: - against -

ANGEL MUSIC GROUP LTD., NEIL MOFFITT,
NICK McCABE, JESSIE ANGLES, ANU DHAMI,
ISABEL PIAGGI, and DAN A. VIDAL,**NOTICE OF MOTION TO
ADMIT COUNSEL
PRO HAC VICE**

Defendants.

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PLEASE TAKE NOTICE that, upon the annexed Affidavit of Michael Liberman,
Esq., Declaration of Ronald Richards, Esq., and the Certificate of Good Standing for Ronald
Richards, Esq.. attached as Exhibits A thereto, Defendant Neil Moffitt, by his attorneys Epstein
Becker & Green, P.C., will move this Court, before the Honorable P. Kevin Castel, United States
District Judge, at the United States Courthouse for the Southern District of New York, pursuant
to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and
Eastern Districts of New York, for an Order allowing the admission of Ronald Richards, Esq., a
member of the Law Firm Ronald Richards and Associates, and a member in good standing of the
Bar of the State of California, as attorney pro hac vice for Defendant Neil Moffitt in the above-
captioned matter.

3-10-08
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mcx

Dated: New York, New York
March 10, 2008

EPSTEIN BECKER & GREEN, P.C.

By: 
Michael Liberman
250 Park Avenue
New York, NY 10177-0077
(212) 351-4500
Attorneys for Defendants Angel Music
Group Ltd. and Neil Moffitt

TO: Peter M. Ripin, Esq.
Davidoff Malito & Hutcher LLP
605 Third Avenue
New York, New York 10158
(212) 557-7200
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>----- x</p> <p>THE MANAGEMENT GROUP, LLC, ANDREW FOX, and LEE HEIMAN,</p> <p>Plaintiffs,</p> <p>- against -</p> <p>ANGEL MUSIC GROUP LTD., NEIL MOFFITT, NICK McCABE, JESSIE ANGLES, ANU DHAMI, ISABEL PIAGGI, and DAN A. VIDAL,</p> <p>Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>08-02172(PKC)</p> <p>AFFIDAVIT IN SUPPORT OF <u>ADMISSION PRO HAC VICE</u></p> <p>:</p> <p>:</p>
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STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

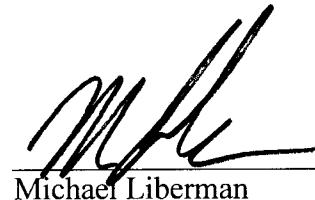
Michael Liberman, being duly sworn, deposes and says:

1. I am an associate of the law firm of Epstein Becker & Green, P.C., located at 250 Park Avenue, New York, New York, counsel to Defendants Neil Moffitt. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant Neil Moffitt's motion to admit Ronald Richards, Esq. as counsel pro hac vice to represent Neil Moffitt in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 3, 2003. I am also admitted to the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing with this Court.
3. Ronald Richards is a member of The Law Firm Ronald Richards and Associates in West Hollywood, California.
4. I have found Mr. Richards to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. An declaration executed by Mr. Richards, which attaches a certificates of his good standing with the bars of the State of California, is submitted herewith.
4. Accordingly, I am pleased to move for the admission of Ronald Richards, pro hac vice.

5. I respectfully submit a proposed order granting the admission of Ronald Richards, pro hac vice, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Ronald Richards, pro hac vice, to represent Defendant Neil Moffitt in the above captioned matter, be granted.

Dated: New York, New York
March 10, 2007



Michael Liberman

Sworn to before me this
10th day of March 2008



Owen G. Wallace
Notary Public

OWEN G. WALLACE
Notary Public, State of New York
No. 02WA6130851
Qualified in Westchester County
Certificate Filed in New York County CJ
Commission Expires July 25, 20 ____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
THE MANAGEMENT GROUP, LLC, ANDREW :
FOX, and LEE HEIMAN, :
Plaintiffs, : 08-02172(PKC)
: :
- against - : DECLARATION IN
: SUPPORT OF ADMISSION
: PRO HAC VICE
ANGEL MUSIC GROUP LTD., NEIL MOFFITT, :
NICK McCABE, JESSIE ANGLES, ANU DHAMI, :
ISABEL PIAGGI, and DAN A. VIDAL, :
: :
Defendants. :
----- x

I, Ronald Richards, Esq., declare under penalty of perjury:

1. I am Ronald Richards of the Law Firm Ronald Richards and Associates located at 9255 Doheny Rd., Suite 502, West Hollywood, CA 90069 and attorneys for defendant Neil Moffitt. My home mailing address is P.O. Box 11480 Beverly Hills, 90213. I make this declaration in support of my petition to be admitted pro hac vice as counsel to defendant Neil Moffitt in this action.

2. I have been a member in good standing of the California State Bar since 1995. I am admitted to practice before the California Supreme Court, the 9th and 11th Circuit Court of Appeals, the District of Colorado, the Eastern District of Michigan, and all federal courts in California. My Certificate of Good Standing from the California Supreme Court is attached hereto as Exhibit A.

3. There are no disciplinary proceedings pending against me as a member of the Bar of any jurisdiction, and I have never been censured, suspended or disbarred.

4. I agree to be subject to the orders, disciplinary action and civil jurisdiction of the United States District Court for the Southern District of New York in all respects as if I were a regularly admitted and licensed member of the bar of this Court.

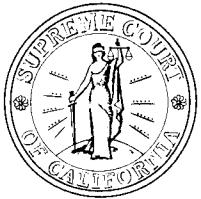
5. I seek to participate in the above matter because of my expertise in the area of entertainment litigation and have become integrally involved with this matter as I have represented the defendants for a long time.

6. I respectfully request that this Court grant the within application for my admission pro hac vice pursuant to Rule 1.3(c) of the Local Civil Rules of Southern and Eastern Districts of New York.

WHEREFORE, I respectfully request that I be admitted pro hac vice for all purposes in this action.

A handwritten signature in black ink, appearing to read "PLR 2-29-08".

EXHIBIT A



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that **Ronald N. Richards**, was on the 1st of June, 1995, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court,
this 29th day of February, 2008.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By


Patricia A. Quinn, Deputy Clerk

CERTIFICATE OF SERVICE

I, Michael Liberman, an attorney admitted to practice before this court, hereby certify, under penalty of perjury, that on March 10, 2008, I caused a true copy of the attached Notice of Motion to Admit Ronald Richards, Esq. pro hac vice, Affidavit of Michael Liberman, dated March 10, 2008, Declaration of Ronald Richards, Esq., dated February 29, 2008, and the exhibit attached thereto, and Proposed Order, to be served by first class mail upon:

Larry Hutcher
Davidoff Malito & Hutcher, LLP
605 Third Avenue
New York, New York 10158



A handwritten signature in black ink, appearing to read "ML", is placed above a horizontal line. Below the line, the name "Michael Liberman" is printed in a small, sans-serif font.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE MANAGEMENT GROUP, LLC, ANDREW :
FOX, and LEE HEIMAN, :
Plaintiffs, :
: 08-02172(PKC)
- against - :
ORDER GRANTING
ADMISSION PRO HAC VICE
ANGEL MUSIC GROUP LTD., NEIL MOFFITT,
NICK McCABE, JESSIE ANGLES, ANU DHAMI,
ISABEL PIAGGI, and DAN A. VIDAL, :
Defendants. :

Upon the motion of Michael Liberman, attorney for Defendants Angel Music Group Ltd. and Neil Moffitt and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Ronald Richards, Esq.
Law Firm of Ronald Richards and Associates
P.O. Box 11480
Beverly Hills, CA 90213
310-556-1001
ron@ronald richards.com

is admitted to practice pro hac vice as counsel for Defendant Neil Moffitt in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Hon. P. Kevin Castel, United States District Judge